

[COUNSEL LISTED ON SIGNATURE PAGE]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

HUAWEI TECHNOLOGIES CO., LTD.,
HUAWEI DEVICE USA, INC., and
HUAWEI TECHNOLOGIES USA, INC.,

Plaintiffs / Counterclaim
Defendants,

vs.

SAMSUNG ELECTRONICS CO., LTD,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants / Counterclaim-
Plaintiffs,

and

SAMSUNG RESEARCH AMERICA, INC.,

Defendant,

v.

HISILICON TECHNOLOGIES CO., LTD.,

Counterclaim-Defendant.

Case Number: 3:16-cv-2787-WHO

**STIPULATED REQUEST AND
[PROPOSED] ORDER TO ADJUST
CERTAIN DISCOVERY DATES**

Pursuant to Civil Local Rule 6-2, Plaintiffs and Counterclaim-Defendants Huawei Technologies Co., Ltd., Huawei Device USA, Inc., Huawei Technologies USA, Inc., and HiSilicon Technologies Co., Ltd. (collectively, “Huawei”) and Defendants and Counterclaim-Plaintiffs Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Research America, Inc. (collectively, “Samsung”), through their respective counsel, respectfully request that certain discovery deadlines be adjusted as follows:

Event	Current Date	Proposed Date
Opening expert reports	April 13, 2018	April 27, 2018
Further Case Management Conference before Judge Spero	May 4, 2018	No change
Rebuttal expert reports	May 11, 2018	May 25, 2018
Expert discovery cut off	June 8, 2018	June 22, 2018
Case Narrowing: reduce asserted patents to no more than 5, asserted claims to 10, and accused products to 15	June 15, 2018	June 26, 2018
Case Narrowing: limit invalidity references, systems, combinations to 25	June 22, 2018	June 29, 2018

The extension is requested to accommodate the schedules of experts and counsel. Among other things, in view of the fact depositions that were taken in the weeks following the close of fact discovery, the current schedule does not allow adequate time for experts to prepare opening reports related to issues raised in those depositions. The requested adjustments will not have an effect on other deadlines in this case.

Previous Time Modifications in the Case

Pursuant to Civil L.R. 6-2(a), the parties state that there have been 11 previous time modifications in this case: (1) a stipulation extending the time for Samsung to respond to Huawei’s Complaint (Dkt. 30); (2) a stipulation and order rescheduling the initial Case Management Conference and extending the time for Samsung to respond to Huawei’s Complaint (Dkt. 38); (3) a stipulation and order rescheduling the hearing date and briefing deadlines for Samsung’s Partial Motion to Dismiss (Dkt. 62); (4) a stipulation extending the time for Huawei to respond to Samsung’s Answer and Counterclaims (Dkt. 68); (5) a stipulation and order rescheduling the hearing date and briefing deadlines for Samsung’s Partial Motion to Dismiss (Dkt. 83); (6) a stipulation and order rescheduling the initial claim construction disclosure dates (Dkt. 112); (7) a

1 stipulation and order rescheduling the initial technology tutorial and claim construction dates
 2 (Dkt. 139); (8) a stipulation and order rescheduling the claim construction hearing date (Dkt. 157);
 3 (9) an order extending the close of discovery, resetting the trial date, and adjusting intermediate
 4 deadlines (Dkt. 207); (10) an order adjusting certain briefing deadlines on Samsung's motion for an
 5 injunction (Dkt. 239); and (11) an order permitting certain fact discovery to be completed out of
 6 time (Dkt. 250).

8 Dated: March 29, 2018

Respectfully Submitted,

9 By: /s/ Michael J. Bettinger

By: /s/ Charles K. Verhoeven

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 25 *Huawei Device USA, Inc., Huawei*
 26 *Technologies USA, Inc., and HiSilicon*
Technologies Co., Ltd.

Attorneys for Samsung Electronics Co., Ltd.,
Samsung Electronics America, Inc., and
Samsung Research America, Inc.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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3 Dated: _____
4 The Honorable Joseph C. Spero
5 United States Magistrate Judge
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ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatures below.

Dated: March 29, 2018

By: Michael J. Bettinger
Michael J. Bettinger